

Joint Status Report Pursuant to Rule 26(f)

Caption: Carol A. Keating-Reichwein v. Universal Companies Civil Action No: 13-7290

Basis of Jurisdiction: Diversity

Jury Trial: X Non-Jury Trial: _____ Arbitration:

Plaintiff's counsel participating in the Rule 16 Conference: Elliot A. Strokoff

Defendant's counsel participating in the Rule 16 Conference: Joan E. Clarke

Do counsel have full authority to settle at Rule 16 Conference? Yes

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? June 9, 2014

When did the parties comply with Rule 26(a)'s duty of self-executing disclosure? Pending

Does either side expect to file a case-dispositive motion? no (yes/no)

If yes, under what Rule

If yes, specify the issue

Proposed deadline for filing dispositive motions: December 1, 2014

Does either side anticipate the use of experts? Possibly

If yes, what is the proposed deadline for expert discovery? Oct. 31, 2014/Nov. 14, 2014

Approximate date case should be trial-ready: February 1, 2015

Time for Plaintiff's case: 3 days Time for Defendant's case: 3 days

Is a settlement conference likely to be helpful? _____ If so, when:

Early _____ (yes/no) After Discovery yes (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for final disposition? Not acceptable

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 120 days.
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes.
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. None
5. If you contend the discovery period should exceed 90 days, please state reason:
30 days beyond standard track was agreed to because of the number of grants (5) at issue, and large volume of documents and emails concerning between and among numerous individuals.